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20 Attorneys for Plaintiff
21 GOPRO, INC.

22 UNITED STATES DISTRICT COURT

23 FOR THE NORTHERN DISTRICT OF CALIFORNIA

24 15 GOPRO, INC., a Delaware corporation,

25 Case No. 16-1944 (SI)

26 16 Plaintiff,

27 v.
28 **DECLARATION OF BYRON R.
CHIN IN SUPPORT OF GOPRO,
INC.'S ADMINISTRATIVE MOTION
TO FILE DOCUMENTS UNDER
SEAL**

29 19 Defendant.

30 20 Date: November 3, 2017
31 Time: 9:00 a.m.
32 Ctrm: 1, 17th Floor
33 Hon. Susan Illston

1 I, Byron R. Chin, upon personal knowledge or information and belief, state as follows:

2 1. I am an attorney and a member of the bar of the State of California. I am an associate
3 with Kilpatrick Townsend & Stockton LLP, and represent GoPro, Inc. in this litigation. I am over the
4 age of 18 and otherwise competent to make this declaration.

5 2. I submit this declaration pursuant to Civil Local Rule 79-5(d) in support of GoPro's
6 Administrative Motion to File Documents Under Seal. I have personal knowledge of the facts set
7 forth herein, except where noted, and, if called to testify, could and would competently testify thereto
8 under oath.

9 3. GoPro requests sealing of materials that the parties have designated as "Confidential"
10 or "Highly Confidential—Attorneys' Eyes Only" under the Protective Order entered by this Court on
11 June 26, 2017 (Dkt. 73 "the Protective Order"). I have reviewed each of the following documents
12 discussed below.

13 4. GoPro seeks to seal portions of Plaintiff GoPro, Inc.'s Reply in support of its Motion
14 for Summary Judgment on page 7, which reference materials that 360Heros has designated as
15 "Confidential" or Highly Confidential – Attorneys' Eyes Only." Accordingly, GoPro relies on
16 360Heros' designations to support its Administrative Motion to File Documents Under Seal.

17 I hereby declare under penalty of perjury under the laws of the United States of America that
18 the foregoing is true and correct. Executed this 13th day of October, 2017, at San Francisco,
19 California.

20 /s/ *Byron R. Chin*

21 BYRON R. CHIN

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